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**REMARKS**

Claims 1-91 are currently pending in the subject application and are presently under consideration. Claims 1, 3, 11, 18, 20, 39, 44, 47-49, 53, 59, 77, 82, 85, and 86 have been amended herein. Claim 19 has been cancelled herein. A marked-up version of all pending claims is found at pages 2-23 of this Reply.

In a telephonic interview on February 17, 2004, applicants' representative spoke with the Examiner regarding the recitation of the "function object" as a distinct aspect of the claims. During the course of the interview, the Examiner agreed that the prior art of record did not teach the function object described in the subject specification and recited in the amended claims. Furthermore, the amendments herein should be entered since the limitations of the subject amendments were presented in originally filed claims 2, 5, 10, 20-22, 29, 30-38, 50, 61-63, and 67-76, and therefore such amendments do not require further search or consideration.

Applicants' representative notes with appreciation the allowance of claims 51 and 52, and the Examiner's indication that claims 17, 24-28, 31, 33, 34, 36, 38, 58, 65, 66, 69, 71, 72, 74, 76, and 87 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants' representative reserves the right to do so at a later date if necessary. However, it is not believed that such amendments presently are necessary in view of the amendments and comments herein.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

**I. Rejection of Claims 1-5, 7-10, 18-23, 28-29, 32, 35, 37, 44-50, 48-50, 59-64, 67, 70, 73, 75, 82-86, and 90-91 Under 35 U.S.C. §103(a)**

Claims 1-5, 7-10, 18-23, 28-29, 32, 35, 37, 44-50, 48-50, 59-64, 67, 70, 73, 75, 82-86, and 90-91 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Beckett *et al.* (U.S. 6,564,368) in view of Liu *et al.* (U.S. 6,216,131). This rejection should be withdrawn for at least the following reasons. Neither Beckett *et al.* nor Liu *et al.*, alone or in combination, teach or suggest every limitation set forth in the subject claims.

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To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The present invention relates to mapping a source object with a target object, and more specifically to a graphical user interface and methods for defining a mapping between a source object and a target object in a mapping tool. Amended independent claim 1 recites "... a mapping between the graphical representation of the source object and the graphical representation of the target object *using graphical mapping indicia, the graphical mapping indicia comprises at least one graphical link indicia and a function object.*" Independent claims 3, 11, 18, 39, 44, 47, 48, 49, 53, 59, 77, 82, 85, and 86 have been amended to recite similar aspects. Independent claims 29 and 67 also recite the limitation of a *function object*. Support for the amendments can be found in the specification, such as, "*The graphical mapping indicia [collectively] 16 comprises links 16a and function objects or functoids 16b in the mapping screen region 12...*" (Page 13, lines 27-28.) Figures 5 and 7a clearly illustrate that the *function object is separate and distinct from link indicia*. Beckett *et al.* does not teach or suggest such aspects as set forth in the subject claims.

The Examiner contends that the lines shown by Figure 5D of Beckett *et al.* represent a connection between a source object node and a target object node, and, thus, "...the application development environment user interface described by Beckett is also understood to comprise a mapping screen region, wherein this mapping screen region is the Connection Editor in general, and wherein this mapping screen region is adapted to

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allow a user to create a mapping between the source program tree and the target program tree using graphical mapping indicia with a graphical link indicia adapted to associate the target node with the source node.” However, the lines of Figure 5D are not “function objects or functoids 16b” as set forth in the subject independent claims. The subject application clearly delineates the differences between *function objects 16b* and “connection indicia 18b in the regions 4 and/or 8 graphically indicating that a node in the source and/or target objects 6 and/or 10 is connected or linked to another entity via the mapping 14.” (Page 14, lines 2-5.)

Liu *et al.* fails to overcome the deficiencies of Beckett *et al.* with respect to the subject independent claims. Specifically, Liu *et al.* fails to teach or suggest that the “graphical mapping indicia comprises at least one graphical link indicia and a function object.” Thus, neither Beckett *et al.* nor Liu *et al.* alone or in combination, teach or suggest applicants’ invention as set forth in the claims.

In view of the above, it is respectfully submitted that the combination of Beckett *et al.* and Liu *et al.* does not make obvious claims 1, 3, 11, 18, 29, 39, 44, 47, 48, 49, 59, 67, 82, 85, and 86 (and claims 2, 4-5, 7-10, 19-23, 28, 35, 37, 45-50, 60-64, 70, 73, 75, 83-86, and 90-91, which depend respectively there from). Therefore, this rejection should be withdrawn.

## II. Rejection of Claims 6, 39-43, 77-81, and 89 Under 35 U.S.C. §103(a)

Claims 6, 39-43, 77-81, and 89 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Beckett *et al.* (U.S. 6,564,368) and Liu *et al.* (U.S. 6,216,131) in view of Adobe Acrobat Reader, Figure A (hereinafter “Adobe”). Withdrawal of this rejection is respectfully requested for at least the following reasons. Neither Beckett *et al.* nor Liu *et al.* nor Adobe, alone or in combination, teach or suggest each and every limitation of the claimed invention.

As stated above, independent claims 3 recites “...graphical mapping indicia comprising at least one graphical link and at least one graphical function object.”

Independent claims 39, 77, and 86 recite similar aspects. In view of the above

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comments, it is readily apparent that neither Beckett *et al.* nor Liu *et al.* teach or suggest such elements of the present invention.

Adobe fails to overcome the deficiencies of Beckett *et al.* and Liu *et al.* with respect to independent claims 3, 39, 77, and 86. Specifically, Adobe does not teach or suggest that graphical mapping indicia comprising at least one graphical link and at least one graphical function object. As discussed above, a *function object* 16b is distinguished from a connection indicium 18b, such as a line, by the subject application. Neither Beckett *et al.* nor Liu *et al.* nor Adobe, alone or in combination, teach or suggest such aspects of the present invention. Accordingly, this rejection should be withdrawn.

**III. Rejection of Claims 11-13, 14-16, 30, 53-57, 68, and 88 Under 35 U.S.C. § 103(a)**

Claims 11-13, 14-16, 30, 53-57, 68, and 88 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Beckett *et al.* (U.S. 6,564,368) and Liu *et al.* (U.S. 6,216,131) in view of Delphi 3, as described by Neil Rubenking in the book entitled *Delphi 3 for Dummies*. This rejection should be withdrawn for at least the following reasons. Claims 12-13, 14-16, 30, 54-57, 68, and 88 depend respectively from independent claims 11, 29, 53, 67, and 86.

In view of the comments above, it is readily apparent that neither Beckett *et al.* nor Liu *et al.*, alone or in combination, teach or suggest each and every aspect of the present invention as set forth in the subject claims. Delphi 3 fails to make up for the deficiencies of Beckett *et al.* and Liu *et al.* with regard to independent claims 11, 29, 53, 67, and 86. Specifically, Delphi 3 does not teach or suggest graphical mapping indicia comprising a function object as presently claimed.

Therefore, it is respectfully requested that this rejection be withdrawn.

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CONCLUSION

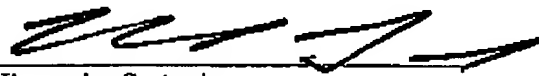
The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any additional fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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